

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al.)	Case No. 01-01139 (JKF)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 9302, 11549
)	

**DEBTORS' REBUTTAL EXPERT WITNESS DISCLOSURE FOR ASBESTOS PD
ESTIMATION PHASE I**

Please take notice that pursuant to the Court's PD Estimation Case Management Order (Docket Nos. 9302 and 11549 (amended)) and consistent with an agreed-upon extension of time, Debtors submitted today, under separate cover, the following PD Estimation Phase I expert rebuttal reports: (1) Richard J. Lee, Ph.D., Rebuttal Expert Report: Limitation of Dust Sampling Methodology; (2) Rebuttal Report of Roger G. Morse AIA on ASTM Microvacuuming Dust Sampling Methods; (3) Supplement to Expert Report of Morton Corn, Ph.D., CSP Submitted October 14, 2005; and (4) Rebuttal Witness Disclosure of William G. Hughson, M.D., D.Phil. Pursuant to Federal Rule of Civil Procedure 26(a)(2).

The above-referenced rebuttal reports are submitted in response to the four Phase I reports that the PD Committee submitted on December 7, 2005. Because Debtors contend (see Docket No. 11434) that the PD Committee has not properly disclosed its anticipated Phase I fact witnesses, Debtors hereby reserve the right to proffer additional testimony to address any new contention(s) not described in any of the four Phase I reports that the PD Committee submitted on December 7, 2005.


Wilmington, Delaware
Dated: January 20, 2006

Respectfully submitted,

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